

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

<b>In re:</b>	<b>Robyn C. Coram</b>	)	
		)	
	<b>Debtor.</b>	)	<b>Case No. 09-37574-KLP</b>
		)	<b>Chapter 13</b>
<b>Address</b>		)	
	<b>Robyn C. Coram</b>	)	
		)	
	<b>457 Flat Rock Rd.</b>	)	
		)	
	<b>Kenbridge, VA 23944</b>	)	

Last four digits of SSN or ITIN: **0752**

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**NOTICE OF MOTION TO EMPLOY SPECIAL COUNSEL**

**Jason M. Krumbein, Esq.** has filed papers with this court seeking approval of employment of special counsel.

**Your rights may be affected. You should read these papers carefully, and discuss them with your attorney in this Bankruptcy Case, if you have one. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then on or before 14 DAYS FROM TODAY, you or your attorney must:

File with the court and mail a copy to the Debtors' counsel, at the addresses shown below, a written request for a hearing. If you mail your request for hearing to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

Clerk of the Court  
U.S. Bankruptcy Court  
701 E. Broad St., Suite 4000  
Richmond, VA 23219

Jason M. Krumbein, Esq.  
Krumbein Consumer Legal Services, Inc.  
5310 Markel Road, Suite 102  
Richmond, VA 23230

You must also attend a hearing to be scheduled at a later date.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion, and may enter an order granting that relief.

Date: December 23, 2013

/s/ Jason M. Krumbein, Esq.

5310 Markel Road, Suite 102

Richmond, VA 23230

VSBN 43538

Counsel for Debtor in Bankruptcy

**CERTIFICATE OF SERVICE**

See certification in Application Attached hereto

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
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		)	<b>Case No. 09-37574-KLP</b>
	<b>Debtor.</b>	)	<b>Chapter 13</b>
		)	
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	<b>Robyn C. Coram</b>	)	
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	<b>Kenbridge, VA 23944</b>	)	

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**MOTION TO EMPLOY SPECIAL COUNSEL**

**COMES NOW**, Krumbein Consumer Legal Services, Inc., counsel for Debtor(s), and pursuant to 11 USC 330 says as follows:

- 1) This motion is filed pursuant to 11 USC 30.

**JURISDICTION, VENUE, CORE PROCEEDING**

- 2) This court has jurisdiction pursuant to 28 USC 1441.
- 3) This is the proper venue pursuant 28 USC 1391.
- 4) This is a core proceeding pursuant to 28 USC 157.

**PARTIES**

- 5) The movants are the Debtors in the above identified case, as defined by the Bankruptcy Code.
- 6) Respondents are creditors as defined by the Bankruptcy code.

**FACTS**

- 7) Movants filed a Voluntary Petition for Relief in this court on 11/17/2009.

- 8) Movant wishes to employ special counsel to prosecute a complaint for violations of the Automatic Stay.
- 9) Counsel has agreed to represent movant if the court approves this employment.
- 10) Counsel is to be paid on contingency from the defendant.

**RELIEF REQUESTED**

Movants request that the court approve the foregoing motion for the reasons stated above.

/s/ Jason M. Krumbein, Esq.  
Jason M. Krumbein, Esq. VSBN 43538  
Counsel for the Debtor(s) in Bankruptcy  
Krumbein Consumer Legal Services, Inc.  
5310 Markel Road, Suite 102  
Richmond, VA 23230  
Tel: 804.303.0204 Fax: 804.303.0209  
jkrumbein@krumbeinlaw.com

**CERTIFICATE OF SERVICE**

I certify that I have this December 23, 2013, transmitted a true copy of the foregoing application electronically through the court's CM/ECF system to the Chapter 13 Trustee and US Trustee, and by regular mail to the to the Debtor and all creditors listed on the attached Service List.

/s/ Jason M. Krumbein, Esq.  
Counsel for the Debtor(s) in Bankruptcy

Capital One Auto Finance, c/o Ascension Capital Gr P.O. Box 201347 Arlington, TX 76006	Community Memorial Healthcentr PO Box 90 South Hill, VA 23970	ECMC PO Box 75906 St. Paul, MN 55175
CitiFinancial, Inc. P.O. Box 140489 Irving, T X 75014-0489	Premier BankCard/Charter P.O. Box 2208 Vacaville, CA 9569	The Oulton Law Firm, PLLC 2807 N Parham Rd Suite 107 Richmond, VA 23294
PRA Receivables Management, LLC As Agent of Portfolio Recovery Assocs. PO Box 41067 Norfolk, VA 23541	Seventh Avenue C/O Creditors Bankruptcy Service P.O. Box 740933 Dallas, TX 75374	Ginny's c/o Creditors Bankruptcy Service P O Box 740933 Dallas,Tx 75374
Vanda, LLC c/o Weinstein & Riley, P.S. 2001 Western Ave., Ste. 400 Seattle, WA 9812	Portfolio Recovery Associates, LLC POB 41067 Norfolk, VA 23541	APPLIED BANK P.O. BOX 17125 WILMINGTON, DE 19850-712
Capital One Bank (USA), N.A. by American Infosource Lp As Agent PO Box 71083 Charlotte, NC 28272-1083	LVNV Funding LLC its successors and assigns as assignee of MHC Receivables, LLC Resurgent Capital Services PO Box 10587 Greenville, SC 29603-0587	Robyn C. Coram 457 Flat Rock Rd. Kenbridge, VA 23944